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December 6, 1995

David Werdegar, M.D., M.P.H. Health Policy and Planning Division Office Of Statewide Health Planning and Development 1600 9th Street, Suite 400 Sacramento, California 95814

Dear Dr. Werdegar:

This letter is in response to the second round of risk adjusted outcome reports published by your office. We are pleased to see that the OSHPD validation studies have been completed prior to the release of the final report, and that the invalid diskectomy report will not be published. The validation studies have confirmed our initial position regarding the manner in which these analyses where conducted. It is very important that criteria used are as objective as possible and not biased by the coding variations allowed within the ICD-9-CM system. It would also be preferable if all studies could be validated prior to public release of the information. The advent of the "present on admission" indicators on January 1, 1996 should augment this effort.

Thank you for the opportunity to comment on the RAMO project. We welcome the continuing effort by OSHPD to develop valid clinical quality indicators.

Frances Hanckel, Sc.D.

Chief Operating Officer

Eldon Blackman

Eldon B. Hickman, M.D.

Medical Director